2.9 <u>Significant Irreversible Environmental Changes</u> <u>Resultant from Project Implementation</u>

CEQA Guidelines Section 15127 requires irreversible changes be evaluated in EIRs prepared for projects that would involve: (a) the adoption, amendment, or enactment of a plan, policy, or ordinance of a public agency; (b) the adoption by a Local Agency Formation Commission (LAFCO) of a resolution making determinations; and (c) the requirements for preparing an environmental impact statement pursuant to the National Environmental Policy Act. The proposed Project would involve an amendment to the General Plan. The following analysis addresses Project changes that would be considered irreversible and Project commitments/use of resources that would be considered irretrievable.

The proposed Project would result in the development of the site for a mix of residential, retail, and office uses. The proposed Project represents a continued commitment of land to urban uses, which intensifies land use on the 253-acre Project site. Once developed, reverting to a less urban use is highly unlikely. Development of the Project site would constrain future land use options.

Several irreversible commitments of limited resources would result from implementation of the proposed Project. The resources include but are not limited to the following: lumber and other forest products; sand, gravel, and concrete; asphalt; petrochemical construction materials; steel, copper, lead and other metals; and water consumption. In addition, non-renewable fuels would be used by construction equipment, haul trucks, and worker vehicles. This commitment of resources and energy would be commensurate with that of other projects of similar size but would be irretrievable.

Post-construction operational energy uses of the facilities associated with the Project would include the use of electricity, natural gas, and water by Project residents, employees, and consumers. This energy use would be a long-term commitment and the use of energy would be irretrievable, although any energy saving features of the Project would reduce this commitment. The Project site does not contain any significant oil other energy sources that would be adversely affected by Project implementation.

The 1994 EIR found the loss of important farmland (Prime Farmland, Farmland of Statewide Importance, and Farmland of Local Importance) to be less than significant as there was limited area with the classification and agricultural use could continue in the Specific Plan area as an interim use prior to build-out. The 2000 SEIR did not address agricultural resources; the 2012 Addendum found no impacts to agricultural resources. In addition, active agricultural activities were not in evidence at the time of certification of the 1994 EIR and no mitigation measures were deemed necessary. The Project site is designated as Farmland of Local Importance and has soil types classified as Prime Agricultural soils. However, the Project site is not under a Williamson Act contract. The Project site has not been used for any agricultural purpose since at least 1996 and there are no active agricultural operations within a ten-mile radius. Although development of the proposed Project would irreversibly preclude the Project site agricultural use, this is

2.9 Significant Environmental Effects of the Proposed Project

not considered a significant impact, as the Project site has not been utilized for agricultural uses in at least two decades and the current General Plan land use designation (Village) is contrary to agricultural use for the site.

No potentially significant loss of availability of a known mineral resource of value to the region and the residents of the state would occur as a result of the Project. Although the site contains a mineral resource designation of MRZ-2, no impacts to mineral resources were anticipated by the 1994 EIR. The 2000 SEIR did not address mineral resources; the 2012 Addendum found no impacts to mineral resources. Prospects were reported in the San Ysidro Mountains to the east of the Specific Plan area. That site is at the western base of the San Ysidro Mountains and is approximately one mile northwest of the proposed Project site. However, the Project site has not been actively mined and contains no known mineral resources. In addition, there are no active or abandoned mines or quarries in the Project vicinity.

The Project would not result in the permanent loss of availability of a known mineral resource that would be of value to the region and its residents or the State. The Project site is within the approved Specific Plan area, which is not designated as the location of mineral resources or potential location for mining and quarries. Furthermore, there is an existing approved Tentative Map (TM 5538) in effect on the Project site, which would allow light industrial development to occur. The Specific Plan area, Project site, and surrounding areas are not classified as MRZ-2. With approval of the EOMSP, along with the Project site's S-88 zoning designation that allow full development of the Specific Plan area, the County has determined that the Specific Plan area is not a suitable location for mineral extraction. Accordingly, implementation of the Project would not affect mineral resources or require the need for further analysis of mineral resources.